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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SAMUEL OSEI KWARTENG,)	Case No.: 2:25-cv-1121-JDP
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 18, 2025, up to and including October 20, 2025. This is Defendant's first request for an extension.

Defendant requests this extension in order to further consider the administrative record in light of the issues raised in Plaintiff's motion. The undersigned has a number of competing deadlines in cases pending in this district.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: September 16, 2025

/s/ Paul Sachelari*

(*as authorized via e-mail on September 16, 2025)

PAUL SACHELARI

Attorney for Plaintiff

Dated: September 16, 2025

ERIC GRANT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Erin Jurrens

ERIN JURRENS

Special Assistant U.S. Attorney


Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including October 20, 2025, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: September 16, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE